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9 Attorneys for Donald and Grace Mansel

10 UNITED STATES BANKRUPTCY COURT
 11
 12 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

13 In re

14 PG&E Corporation,

15 and

16 PACIFIC GAS AND ELECTRIC
 17 COMPANY,

18 Debtors.

19 ☐ Affects PG&E Corporation
 20 ☐ Affects Pacific Gas and Electric Company
 21 ☒ Affects both Debtors

22 *All papers shall be filed in the Lead Case,
 23 No. 19-30088-DM,

Case No. 19-30088-DM

Chapter 11

Lead Case, Jointly Administered

**DECLARATION OF RICHARD
 FRANKEL IN SUPPORT OF MOTION
 PURSUANT TO FED. R. BANKR. PROC.
 7015 FOR AN ORDER DEEMING
 AMENDED CLAIM TO RELATE
 BACK/OR PURSUANT TO FED. R.
 BANKR. P. 9006(b)(1) TO ENLARGE THE
 TIME FOR DONALD AND GRACE
 MANSEL TO FILE PROOF OF CLAIM**

Date: August 4, 2020

Time: 10:00 a.m.

Ctrm.: Courtroom 17
 450 Golden Gate Avenue
 San Francisco, CA 94102

Judge: Hon. Dennis Montali

Objection deadline: July 28, 2020
 4:00 p.m. (Pacific Time)

24 I, Richard Frankel, hereby declare as follows:

25 1. I am an attorney at law duly licensed to practice before the courts of the State of
 26 Texas, and in numerous federal courts. I am a lawyer with Reiner, Slaughter & Frankel, LLP,
 27 based in Redding, California.

28 2. My law firm represents wildfire victims who sustained losses from the Camp Fire
 in 2018. My firm has timely filed over 800 Proof of Claim forms with Prime Clerk for losses

1 clients have suffered as a result of these fires.

2 3. Donald Mansel filed claims in this matter for property loss on October 17, 2019,
3 well before the extended December 31, 2019 Claims Bar Date Deadline had passed.

4 4. On May 4, 2020, I became informed that Donald Mansel's wife, Grace Mansel,
5 suffered these losses equally.

6 5. As soon as I became aware that no proof of claim was filed for Grace Mansel, we
7 filed the amended proof of claim on May 15, 2020 and sought the assistance of local counsel to
8 file this Motion.

9 6. I am over eighteen years of age, of sound mind, and fully-competent to make this
10 declaration. All statements in this declaration are based on my own personal knowledge and
11 observation and from my review of the court and business records in this case, or upon
12 information and belief as indicated. If called to testify on this matter, I can and would competently
13 testify to the matters set forth in this Declaration.

14 I declare under penalty of perjury pursuant to the laws of the United States of America that
15 the foregoing is true and correct.

16 Executed this 13th day of July, 2020, in Houston, Texas.

17
18 By: 

RICHARD FRANKEL